

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CRAIG ALLEN ZIMMERMAN and	:	CHAPTER 13
MEREDITH ANN ZIMMERMAN	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CRAIG ALLEN ZIMMERMAN and	:	
MEREDITH ANN ZIMMERMAN	:	
Respondents	:	CASE NO. 1-23-bk-00456

TRUSTEE'S OBJECTION FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 17<sup>th</sup> day of January, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

1. The Trustee avers that debtors' plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 17th day of January, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Cibik, Esquire  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee